

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
WORLDS, INC.,)	
)	
Plaintiff,)	
)	
vs.)	
)	Civil Action No. 1:12-CV-10576 (DJC)
ACTIVISION BLIZZARD, INC.,)	
BLIZZARD ENTERTAINMENT, INC. and)	JURY TRIAL DEMANDED
ACTIVISION PUBLISHING, INC.,)	
)	
Defendants.)	

STIPULATION REGARDING JOINT MOTION TO STAY

WHEREAS, in May 2015, Bungie, Inc. filed six Petitions for *Inter Parties* Review (“IPR Petitions”) before the U.S. Patent and Trademark Office’s Patent Trial and Appeal Board (“PTAB”), challenging the validity of all patent claims asserted in this lawsuit.

WHEREAS, between November 30, 2015 and December 7, 2015, the PTAB instituted IPR proceedings as to all claims asserted in this lawsuit.

WHEREAS, the PTAB has scheduled hearings on Bungie’s IPR Petitions for August 2016, with final determinations due in late 2016.

IT IS HEREBY STIPULATED AND AGREED by and between the parties that, in light of the pending IPR proceedings, which implicate all patent claims asserted in this lawsuit and may not be resolved for approximately one year, the Parties will, within one week, jointly file a motion to stay all pretrial deadlines, discovery, and other proceedings in this lawsuit pending resolution of the IPR proceedings.

The parties further stipulate and agree to withdraw all pending discovery requests immediately, including all requests for production of documents, requests for production of emails and electronically stored information, interrogatories, notices of deposition, and third-party subpoenas. In the event that a party believes in good faith that a witness or source of evidence may become unavailable, the parties agree not to oppose a motion for relief from the stay for the limited purpose of preserving that evidence.

In addition, the parties stipulate and agree to be bound in this lawsuit by the PTAB's final written decisions on Bungie's IPR Petitions as to the specific invalidity grounds adjudicated in the final written decisions.

Dated December ____, 2015

SO ORDERED:

Hon. Denise J. Casper
United States District Judge

Dated: December 10, 2015

Respectfully submitted,

By: /s/ Ryan V. Caughey

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ATTORNEYS FOR DEFENDANTS,
ACTIVISION BLIZZARD, INC., BLIZZARD
ENTERTAINMENT, INC. AND
ACTIVISION PUBLISHING, INC.

CERTIFICATE OF SERVICE

I certify that a true copy of the above document was filed through the Court's ECF system on the above date and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Ryan V. Caughey

Ryan V. Caughey